

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> , <i>Plaintiffs,</i>	§ § § § § § §	Case No. 5:21-cv-844-XR (Consolidated Cases)
v.		
THE STATE OF TEXAS, <i>et al.</i> , <i>Defendants.</i>		

**STATE DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLIES IN SUPPORT OF MOTIONS TO DISMISS**

State Defendants, the State of Texas, John Scott, in his official capacity as Secretary of State, and Warren K. Paxton, in his official capacity as Texas Attorney General, file this Unopposed Motion for Extension of Time to File Replies in Support of their Motions to Dismiss the *LUPE* Plaintiffs' and *LULAC* Plaintiffs' respective First Amended Complaints and show the Court the following:

1. On December 1, 2021, the *LUPE* Plaintiffs filed a First Amended Complaint (ECF 140).
2. On January 5, 2022, the State Defendants filed a Motion to Dismiss the *LUPE* Plaintiffs' First Amended Complaint (ECF 176).
3. On January 19, 2022, the *LUPE* Plaintiffs filed a Response to State Defendants' Motion to Dismiss (ECF 197).
4. On January 22, 2022, the *LUPE* Plaintiffs filed a Motion for Leave to File a Second Amended Complaint (ECF 204).
5. Pursuant to Local Rule CV-7(e)(2), State Defendants' deadline to file a Reply in Support of Their Motion to Dismiss the *LUPE* Plaintiffs' First Amended Complaint is January 26, 2022.
6. On December 1, 2021, the *LULAC* Plaintiffs filed a First Amended Complaint (ECF 136).
7. On January 5, 2022, the State Defendants filed a Motion to Dismiss the *LULAC* Plaintiffs' First Amended Complaint (ECF 177).

8. On January 18, 2022, the *LULAC* Plaintiffs filed a Motion for Leave to File a Second Amended Complaint (ECF 194), which was granted on January 19, 2022.
9. On January 19, 2022, the *LULAC* Plaintiffs filed a Response to State Defendants' Motion to Dismiss (ECF 196).
10. Pursuant to Local Rule CV-7(e)(2), State Defendants' deadline to file a Reply in Support of Their Motion to Dismiss the *LULAC* Plaintiffs' First Amended Complaint is January 26, 2022.
11. Counsel for State Defendants are participating in a four-day preliminary injunction hearing in *Brooks, et al. v. Abbott, et al.*; Case No. 1:21-cv-991 (W.D. Tex.), that is set to start January 25, 2022.
12. State Defendants respectfully request that the Court extend the deadline to file their Replies in Support of their Motions to Dismiss the *LULAC* Plaintiffs' First Amended Complaint and the *LUPE* Plaintiffs' First Amended Complaint up to and including February 4, 2022.
13. On January 24, 2022, the undersigned counsel conferred with counsel for the *LULAC* Plaintiffs and the *LUPE* Plaintiffs concerning this request. Plaintiffs do not oppose the requested extension.
14. This motion is not presented for purposes of delay and will not prejudice any party to this litigation.

Date: January 24, 2022

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BRENT WEBSTER
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Respectfully submitted.

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COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that on January 24, 2022, I conferred with Uzoma Nkwonta, counsel for the *LULAC* Plaintiffs, and Nina Perales, counsel for the *LUPE* Plaintiffs, via email regarding this Motion. Plaintiffs do not oppose the requested extension.

/s/ Jeffrey M. White
Jeffrey M. White

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 24, 2022, and that all counsel of record were served by CM/ECF.

/s/ Jeffrey M. White
Jeffrey M. White